

EXHIBIT A

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DECLARATION OF ROBERT HERNQUIST

I, Robert Hernquist, depose and state as follows under penalty of perjury:

1. I am over the age of 18 and mentally competent. I am an attorney licensed to practice in all of the courts in Nevada and I represent Defendant MJ Dean Construction, Inc. ("Defendant" or "MJ Dean") in this matter.

2. I make this Declaration in support of Defendant's Opposition to Plaintiff's First Motion in Limine to Exclude Evidence of Past Lawsuits, Legal Filings and/or Proceedings (ECF 86)

3. My office has reviewed Plaintiff's legal filings and has prepared a matrix summarizing those legal filings. This matrix contains true and accurate information regarding the various legal proceedings Plaintiff has been a party to. A true and correct copy of that matrix is attached as Exhibit B.

4. My office has pulled and compiled various documents filed in lawsuits either directly by Colvin or on his behalf. Attached as Exhibits C through Q and S through X are true and correct copies of documents that were filed in cases where Colvin was a party.

5. Mr. Colvin was deposed on July 15, 2021. Attached as Exhibit R is a true and correct copy of an excerpt from that deposition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and if called upon as a witness I could and would competently testify thereto.

Dated: March 10, 2023


Robert Hernquist